

JUDAH LAKIN (#307740)
judah@lakinwille.com
AMALIA WILLE (#293342)
amalia@lakinwille.com
LAKIN & WILLE LLP
1939 Harrison Street, Suite 420
Oakland, CA 94612
Telephone: (510) 379-9216
Fax: (510) 379-9219

JINGNI (JENNY) ZHAO (#284684)
jenny@advancingjustice-alc.org
ASIAN AMERICANS ADVANCING
JUSTICE – ASIAN LAW CAUCUS
55 Columbus Avenue
San Francisco, California 94111
Telephone: (415) 848-7710
Fax: (415) 896-1702

Counsel for Petitioner-Plaintiff
IMESH PERERA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IMESH PERERA,

Petitioner-Plaintiff,

v.

DAVID W. JENNINGS, Field Office Director,
San Francisco Field Office, United States
Immigration and Customs Enforcement; TAE D.
JOHNSON, Acting Director, United States
Immigration and Customs Enforcement;
ALEJANDRO MAYORKAS, Secretary, United
States Department of Homeland Security; and
MERRICK GARLAND, United States Attorney
General,

Respondents-Defendants.

Case No. 21-cv-04136-BLF

**STIPULATION FOR LEAVE FOR
PETITIONER-PLAINTIFF TO
FILE REPLY RE: PROPOSED
ORDER**

Under Local Rule 7-12, the undersigned Parties stipulate as follows:

WHEREAS, on March 17, 2022, the Court held a hearing on the merits of this case, directed Petitioner-Plaintiff to file a proposed order, and permitted Respondents-Defendants to file a response of no longer than three pages to Petitioner-Plaintiff's proposed order;

WHEREAS, on March 25, 2022, Petitioner-Plaintiff filed his proposed order (ECF 54);

WHEREAS, on April 1, 2022, Respondents-Defendants filed a two-page response to Petitioner-Plaintiff's proposed order (ECF 55).

NOW, WHEREFORE, the Parties submit this stipulation, subject to the Court's approval, that Petitioner-Plaintiff be granted leave to file, within business three days, a two-page reply so that he may address the arguments raised in Respondents-Defendants' response to the proposed order.

Dated: April 7, 2022

Respectfully submitted,

/s/ Jingni (Jenny) Zhao

Jingni (Jenny) Zhao

ASIAN AMERICANS ADVANCING
JUSTICE – ASIAN LAW CAUCUS

/s/ Judah Lakin*

Judah Lakin

/s/ Amalia Wille*

Amalia Wille

LAKIN & WILLE LLP

Attorneys for Petitioner-Plaintiff

Respectfully submitted,

BRIAN M. BOYNTON

Acting Assistant Attorney General

WILLIAM C. PEACHEY

Director

WILLIAM C. SILVIS

Assistant Director

Dated: April 7, 2022

/s/ Christina Parascandola*

CHRISTINA PARASCANDOLA
Senior Litigation Counsel
United States Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
(202) 514-3097
christina.parascandola@usdoj.gov

Attorneys for Respondents-Defendants

* In compliance with Civil Local Rule 5-1(i)(3), as the filer of this document, I attest that concurrence in the filing was obtained from the other signatories.

Dated: April 7, 2022

/s/ Jingni (Jenny) Zhao
Jingni (Jenny) Zhao

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Court grants Petitioner-Plaintiff leave to file, within three business days of this Order, a reply of no more than two pages regarding his Proposed Order Granting Writ of Habeas Corpus, ECF 54.

Dated: April 7, 2022



THE HONORABLE BETH LABSON FREEMAN
United States District Judge